

## **EXHIBIT B**

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IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN WESTERN DISTRICT OF VIRGINIA  
Richmond Division

DONNA K. SOUTTER and TONY LEE )	
WEBB, )	
on behalf of themselves )	
and those similarly situated )	
Plaintiff(s), )	
vs. )	CASE NO. 3:10-cv-0007
EQUIFAX INFORMATION SERVICES, )	(REP)
LLC, )	
Defendant(s). )	
_____ )	

C O N F I D E N T I A L  
\* \* \* \* \*

DEPOSITION OF MARK JOHNSON  
TAKEN ON BEHALF OF THE PLAINTIFF  
ON SEPTEMBER 15, 2010  
IN OKLAHOMA CITY, OKLAHOMA  
\* \* \* \* \*

REPORTED BY: D. ANN FITE, CSR, RPR

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1 A This year.

2 Q The -- was that also for an Equifax case?

3 A No.

4 Q Okay. Then what case was it for?

5 A Miller.

6 Q What is your current job with LexisNexis?

7 A My title is vice president, data services.

8 Q And what is the actual LexisNexis company  
9 that employs you or that writes your paychecks?

10 A LexisNexis Risk Data Retrieval Services,  
11 LLC.

12 Q What is the function or business of that  
13 particular entity?

14 A Creation of public record data bases.

15 Q How long have you worked for that entity?

16 A The entity or --

17 Q Well, let's start with the entity, and then  
18 I'm going to broaden it to include the company as  
19 a whole.

20 A That -- the entity that I mentioned, one --  
21 less than one year, this year.

22 Q And prior to that, who was the official  
23 employer?

24 A I believe Risk and Information Analytics  
25 Group.

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1 Q (By Mr. Bennett) As I understand it,  
2 Mr. Johnson, is that there's -- Equifax's database  
3 of civil records, judgments, bankruptcies, tax  
4 liens, has been gathered in the following sequence  
5 of time. First Superior, then a ChoicePoint named  
6 entity, and then LexisNexis. Are you aware of  
7 that basic sequence?

8 MR. RAETHER: For Virginia.

9 THE WITNESS: For Virginia that's probably  
10 the -- accurate to the best of my knowledge.

11 Q (By Mr. Bennett) Okay. So in that  
12 sequence, you have actually been employed in at  
13 least one predecessor to the LexisNexis division  
14 selling records to Equifax. Correct?

15 A Prior to Lexis acquiring the --

16 Q Yeah. Let me try this more intelligently.

17 When did you first get into this business of  
18 gathering civil public records?

19 A About 15 years ago.

20 Q All right. And who was your employer 15  
21 years ago?

22 A Hogan Information Services.

23 Q And that entity was based in Oklahoma, as I  
24 recall. Correct?

25 A Correct.

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